

HON. JUDGE KARIN J. IMMERMUT

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON AT PORTLAND

JOSEPH GIBSON, RUSSELL SCHULTZ,  
PLAINTIFFS,

vs.

MULTNOMAH COUNTY DISTRICT  
ATTORNEY MIKE SCHMIDT, ET AL,  
DEFENDANTS.

No. 3:20-CV-01580-SB

DECLARATION OF D. ANGUS LEE  
IN SUPPORT OF REPLY  
MEMORANDUM ON JURISDICTION

I, D. ANGUS LEE, declare under the penalty of perjury that the following is true and correct to the best of my knowledge. I am over the age of eighteen, and I am competent to testify to the matters herein. I have personal knowledge of the matters stated herein, or as indicated, have information concerning those matters.

1. I have reviewed a transcript of the grand jury hearing for the underlying state criminal matter.
2. According to the transcript of the grand jury testimony, I see no testimony providing a description of any activity by Russell Schultz, with the exception of a single question to Detective Traynor by Kalbaugh, where Kalbaugh asked the detective if when he went through the video of the event he recognized Joseph Gibson, Matthew Cooper, Russell Schultz, Ian Kramer, Mackenzie Lewis, and Chris Ponte and that when reviewing the video, did he have

any doubt that those people were engaging in acts that Detective Traynor would describe as violent and tumultuous. To that question, the detective answered that he had no doubt.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this Friday, February 5, 2021

/s/ D. Angus Lee

D. ANGUS LEE

DECLARATION LEE I/S/O  
MEMORANDUM ON JURISDICTION  
No. 3:20-cv-01580-SB

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